

Kevin C. Barrett, State Bar No. 020104  
**Barrett & Matura, P.C.**  
7575 Vegas Drive, Suite 150C  
Las Vegas, NV 89128  
Telephone: (702) 833-1033  
Facsimile: (602) 792-5710  
[kbarrett@barrettmatura.com](mailto:kbarrett@barrettmatura.com)

*Attorneys for Defendant*  
*Navigators Specialty Insurance Company*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Centex Homes, a Nevada general  
partnership,

Plaintiff,

v.

Financial Pacific Insurance Company, a  
California corporation; First Specialty  
Insurance Corporation, a Missouri  
corporation, Greenwich Insurance Company,  
a Connecticut corporation; Interstate Fire &  
Casualty Company, an Illinois corporation;  
Lexington Insurance Company, a Delaware  
corporation; Navigators Specialty Insurance  
Company, a New York corporation;  
Scottsdale Indemnity Company, an Ohio  
corporation; St. Paul Fire & Marine  
Insurance Company, a Nebraska corporation;  
Ironshore Specialty Insurance Company, an  
Arizona corporation; and Zurich American  
Insurance Company, a New York  
corporation,

Defendants.

Case No. 2:19-cv-01034-JCM-DJA

**JOINT MOTION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
NAVIGATORS SPECIALTY  
INSURANCE COMPANY TO  
ANSWER PLAINTIFF'S  
COMPLAINT**

**(First Request)**

Defendant Navigators Specialty Insurance Company ("Navigators") and Plaintiff  
Centex Homes ("Centex"), by and through their respective counsel, and pursuant to LR  
IA 6-1, LR IA 6-2, and LR 7-1 of the Local Rules of this Court, hereby submit this Joint  
Motion and Request for an Order extending the time for Navigators to respond to the  
Complaint filed by Centex.

1 Navigators was served with the Complaint on July 30, 2019. The instant extension  
2 is requested as Navigators' counsel requires additional time to prepare an Answer to the  
3 Complaint. Upon agreement by and between these parties, the undersigned respectfully  
4 request this Court grant an extension of time, up to and including September 16, 2019 for  
5 Navigators to file an Answer. By entering into this Stipulation, none of the parties waive  
6 any rights they have under statute, law or rule with respect to Plaintiff's Complaint.

7 This is Navigators' first request for an extension of time to prepare an Answer to  
8 Plaintiff's Complaint.

9 DATED this 28<sup>th</sup> day of August, 2019.

10 BARRETT | MATURA

PAYNE & FEARS, LLP

11 By: /s/ Kevin C. Barrett  
12 Kevin C. Barrett  
13 Attorneys for Defendant Navigators  
Specialty Insurance Company

By: /s/ Sarah J. Odia (w/ permission)  
Scott S. Thomas  
Sarah J. Odia  
Attorneys for Plaintiff

14  
15  
16 **IT IS SO ORDERED.**

17 

18 \_\_\_\_\_  
Daniel J. Albregts  
United States Magistrate Judge

19  
20 Dated: August 30, 2019  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on August 28, 2019, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF system for filing and transmittal of Notice of Electronic filing to the following CM/ECF registrants:

Scott S. Thomas  
Sarah J. Odia  
Payne & Fears, LLP  
6345 S. Rainbow Blvd., Suite 220  
Las Vegas, NV 89118  
Telephone (702) 851-0300  
Facsimile (702) 851-0315  
Attorneys for Plaintiff

George D. Yaron  
Yaron & Associates  
1300 Clay Street, Suite 800  
Oakland, CA 94612  
Telephone: (415) 658-2929  
Facsimile (415) 658-2930  
gyaron@yaronlaw.com

-and-

Pamela McKay  
McKay Law Firm, Chtd.  
9320 Sun City Blvd., Suite 104  
Las Vegas, NV 89234  
Telephone: (702) 835-7956  
Facsimile: (702) 835-6957  
Attorneys for Defendant  
Financial Pacific Insurance Company

Laleaque Grad  
GRAD LAW FIRM  
8275 South Eastern Ave.,  
Suite 200-352  
Las Vegas, NV 89123  
702-990-8387  
702-990-8681 (fax)  
Attorneys for Defendant  
First Specialty Insurance Corporation

/s/ Anita Terry  
Anita Terry